



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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June 25, 2007

Ref: EPR-N

Michael D. Lloyd, District Ranger  
Hell Canyon Ranger District  
Black Hills National Forest  
330 Mount Rushmore Road  
Custer, SD 57730

Re: Norwood Project – Final  
Environmental Impact Statement  
CEQ# 20070219

Dear Mr. Lloyd:

The U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the *Final Environmental Impact Statement* (FEIS) for the Norwood Project on the Black Hills National Forest (BHNF). We offer the following comments in accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4231, et. seq., and EPA's authority under Section 309 of the Clean Air Act, 42 U.S.C. Section 7609.

The United States Forest Service (USFS) proposes to implement multiple resource management actions within the Norwood project area as directed by the Black Hills National Forest Land and Resource Management Plan (Forest Plan). The focus of the proposed project is to enhance vegetative diversity, reduce the risk of mountain pine beetle infestation and large-scale wildfire, provide for wildlife habitat needs and provide a sustainable supply of commercial timber. The project area is located along approximately 22 miles of the Wyoming and South Dakota border in Pennington County, SD and Weston and Crook Counties in Wyoming.

EPA understands that our comments were not received by the deadline, so they are not represented in the FEIS. We appreciate being notified that our letter was received and that the Forest Service would respond to our concerns in a follow-up document. Our understanding is that our comments and the Forest Service's responses -- which we received separately -- will become part of the project and administrative record.

As we stated in our comments, EPA supports the proposed project's stated purpose and need to enhance vegetative diversity, reduce risk of mountain pine beetle infestation and large-scale wildfire, provide for wildlife habitat needs and provide a sustainable supply of commercial timber. EPA's concerns include project impacts to connected disturbed areas (CDAs) and non-CDAs from roads, off-highway vehicle use and livestock, impacts to wetlands, sedimentation in Watershed Influence Zones, and impacts to soil and water resources. We also commented on possible impacts to noxious weed infestations and wildlife habitat. In general, EPA finds the Forest Service's response to our comments thorough and informative. We appreciate the additional information on watershed, geology and soil conditions, the lack of wetland impacts and the Roads Analysis Process.

The Forest Service stated in the response to comments cover letter that it considers information regarding how wood material is sold or processed outside the scope of the project. EPA would like to note that such information is frequently included in EISs that involve timber harvests. The Norwood project will provide slash and small diameter material to the Upton cellulosic ethanol facility, which is designed to eventually produce as much as 20 million gallons of the fuel each year. That is a large amount of small diameter material that would otherwise be burned or left in the woods. EPA would like to see some documented analysis in future projects of the impacts on air quality, water quality and wildlife habitat on the Black Hills National Forest from not burning and/or leaving that wood material on the ground. Impacts from transporting those materials should be part of the analysis.

Overall, EPA commends the Forest Service for its comprehensive FEIS analysis and disclosure regarding the different aspects of the project. The additional narrative discussion will improve public understanding of the impacts from the proposed activities. We appreciate the opportunity to review and provide comments during the NEPA process. If you have any questions, please contact Jody Ostendorf of my staff at 303 312-7814. Thank you for your consideration.

Sincerely,

/s/ Larry Svoboda  
Director, NEPA Program  
Office of Ecosystems Protection and Remediation